

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

VOLUME II OF THE VIDEOTAPED
30(b)(6) DEPOSITION OF TIM ALSUP, produced as a
witness on behalf of the Plaintiff in the above
styled and numbered cause, taken on the 25th day of
June, 2008, in the City of Tulsa, County of Tulsa,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

TULSA FREELANCE REPORTERS
918-587-2878

EXHIBIT

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1 Q Let me ask it this way then: How are the
2 records created that shows the total number of birds
3 that are in fact produced by Cargill; how does that
4 start to get into the computer?

5 MR. WALKER: Object to the form. 09:57AM

6 A When a flock is placed, I believe the flock is
7 given a number, and when given a number, for lack of
8 a better -- I'm not an accountant -- an account is
9 set up, and as that flock is grown, as it receives
10 feed or whatever that flock receives, it goes into 09:57AM
11 that account. Is that what you're talking about?

12 Q Now, who determines how many -- who counts the
13 birds that are placed?

14 A Who counts them?

15 Q How does the computer know the number of birds 09:57AM
16 placed without somebody putting it in there?

17 A It's entered.

18 Q And that's my question. Who determines the
19 amount of birds?

20 A The -- well, every flock -- every contractor 09:57AM
21 has a contract that states the amount of birds that
22 we're going to place, and then as they come up for
23 placement and it's their turn, they get put on a
24 placement schedule.

25 Q Let me ask my question again. How do you know 09:58AM